

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GENE STILP and STEPHEN J. CONNOLLEY, Docket No.: 2:21-CV-03989
The Honorable Gene E.K. Pratter

Plaintiff,

v.

BOROUGH OF WEST CHESTER,

Defendant.

DEFENDANT BOROUGH OF WEST CHESTER'S PROPOSED VOIR DIRE

1. My name is Christine Munion and I represent the Borough of West Chester in this matter. Does anyone know me?

2. Does anyone know anyone who is employed at the Borough of West Chester?

3. Kevin Gore is the Director of Building, Housing and Code Enforcement, and Fire Code Official at the Borough of West Chester and he will be called as a witness. Does anyone know Mr. Gore?

a. If so, how?

4. Shawn Metrick is the Manager for the Borough of West Chester and he may be called as a witness. Does anyone know Mr. Metrick?

a. If so, how?

5. I work for William J. Ferren and Associates, do any of you know any of the attorneys in our office?

6. Have you or anyone in your family been involved a political protest within the last 7 years?

7. Have you or anyone in your family been involved in a protest of any kind within the last 7 years?

8. Do you have any strong opinions regarding protests?

9. Do you have any strong political opinions that would affect your ability be a fair and impartial juror regarding political protests?

10. Do you or anyone in your family have any experience in fire-fighting?

11. Are you employed?

If yes,

- a. what is your occupation?
- b. where do you work?
- c. what type of work do you do?
- d. How long have you worked in that position?

12. Is your spouse employed?

13. What is your spouse's occupation?

14. What type of work does your spouse do?

15. How long had your spouse worked in that position?

16. Have the jurors or any member of their immediate family been a party in any litigation arising out of a motor vehicle accident or personal injuries? If so:

- a. Were you (or your family member(s)) plaintiff or defendant;
- b. Describe facts of case;

17. Will your experience in that particular litigation influence you in your consideration of the instant case?

18. Have the jurors or any member of their immediate family been a party in any other litigation? If so:

- a. What type of litigation?

b. Were you (or your family member(s)) plaintiff or defendant;

19. Have any of the jurors or members of their immediate family ever served as a juror on prior occasions?

- a. What type of case?
- b. Will your experience in that particular lawsuit influence you in your consideration of the instant case?

20. Have any of the jurors or members of their immediate family ever been called to testify as a witness in any prior lawsuit?

- a. What type of case?
- b. Will your experience in that particular lawsuit influence you in your consideration of the instant case?

21. Have any of you or a close family member been through an experience that you believe would have affect your ability to sit as an impartial juror in this case?

22. If anyone has any other reason why they could not serve as a Juror over the next 2 days please raise your hand.

Respectfully submitted,

WILLIAM J. FERREN & ASSOCIATES

By: Christine E. Munion

Christine E. Munion, Esquire

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Attorney for Defendant, Borough of West
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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of October, 2022, I served the foregoing **Defendant**
Borough of West Chester's Proposed Voir Dire upon the following:

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WILLIAM J. FERREN & ASSOCIATES

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